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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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IN RE: THE CHURCH OF JESUS CHRIST  
OF LATTER-DAY SAINTS TITHING  
LITIGATION

*This document relates to all actions.*

**JOINT STIPULATED MOTION TO  
EXTEND TIME TO FILE  
PROPOSED ESI PROTOCOLS  
AND PROTECTIVE ORDERS**

Case No. 2:24-md-03102-RJS-DAO

Chief Judge Robert J. Shelby

Magistrate Judge Daphne A. Oberg

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The Church of Jesus Christ of Latter-day Saints and Ensign Peak Advisors, Inc. (collectively “Defendants”), along with Plaintiffs Daniel Chappell, Masen Christensen, John Oaks, Mark Wilson, Joel Long, Brandall Brawner, Kevin Risdon, Gene Judson, and Michelle Judson (collectively “Plaintiffs,” and together with Defendants, the “Parties”), hereby jointly submit this stipulated motion to extend the time to file a proposed ESI protocol and protective order.

The Court’s September 25, 2024 Order directs the Parties to file no later than October 28, 2024 a stipulated proposed ESI protocol and protective order, or if they cannot agree, separate proposed ESI protocols and protective orders. *See* Order (MDL Dkt. 97) at 1. The Parties request an additional extension of that deadline, with a new deadline of December 6, 2024. Good cause

exists for the extension, including that the Parties have continued to engage in productive negotiations regarding each, exchanged drafts and comments, and conducted multiple conferences regarding the same. The Parties believe, however, that the additional time may allow them to resolve certain areas of disagreement without the need to bring the matters before the Court. Given that discovery is currently stayed, *see* Order (MDL Dkt. 105), an additional extension of the deadline will not have an impact on the case.

Date: October 24, 2024

Respectfully submitted,

/s/ Jason R. Burt

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Date: October 24, 2024

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**CERTIFICATE OF SERVICE**

On this 24th day of October, 2024, I hereby certify that I electronically filed the foregoing JOINT STIPULATED MOTION TO EXTEND TIME TO FILE PROPOSED ESI PROTOCOLS AND PROTECTIVE ORDERS with the Clerk of the Court using the CM/ECF system, which will send an electronic notification to counsel of record for all the parties.

/s/ Jason R. Burt